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FAA-2002-11705-5



AIR TRANSPORT ASSOCIATION

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May 24, 2002

Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW.
Washington, DC 20590-0001

Subject: Notice of Petition for Rulemaking Received; Request for Comments; 67 Fed. Reg., Vol. 67, April 22, 2002; Docket No. FAA-2002-11705, re: **Petition to Revise Certain Flight Data Recorder Regulations**

Ladies and Gentlemen:

FAA has requested comments to a petition to revise parts 121 and 125 of 14 CFR, regarding the resolution and accuracy requirements for three parameters of digital flight data recorders in certain Airbus airplanes. Specifically, the airplane manufacturer requests that FAA amend Appendix M to part 121 of 14 CFR, and Appendix E to part 125, to relax the resolution required of parameter 83 (cockpit trim control input position--roll), and of parameter 84 (cockpit trim control input position--yaw), and to relax the accuracy required of parameter 88 (cockpit flight control input forces--rudder). The changes would apply to certain Airbus model and series airplanes.

The petition states that the "97 FDR Rule", which requires provision of the parameters cited above in airplanes that are delivered after August 19, 2002, was not intended to necessitate retrofit modifications. The petition also states that the manufacturer has, for some time, been delivering these parameters in production airplanes with resolutions and accuracies that do not precisely meet the technical requirements of the "97 Rule". The petition reasons that the required changes to the production configurations of these parameters, and the resultant differences with the configurations of airplanes that are already in service, would not be cost effective, or beneficial in mishap investigations.

On behalf of its member airlines^{1/}, the Air Transport Association supports the amendment as proposed.

1/ ATA's members are Airborne Express, Alaska Airlines, Aloha Airlines, America West Airlines, American Airlines, American Trans Air, Continental Airlines, Delta Air Lines, DHL Airways, Emery Worldwide, Evergreen International Airlines, FedEx Corporation, Hawaiian Airlines, Jet Blue Airways, Midwest Express Airlines, Northwest Airlines, Polar Air Cargo, Southwest Airlines, United Airlines, United Parcel Service, and US Airways. Our associate members are Aeromexico, Air Canada, KLM Royal Dutch Airlines, and Mexicana.

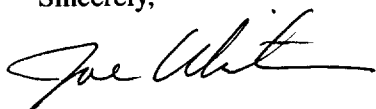
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We appreciate the opportunity to contribute comments to this petition and thank you for your consideration of these views.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe White", with a stylized, cursive script.

Joe White
Director, Aircraft Systems Engineering

JW: 02Aem033

Cc: Mr. G. Davis, AFS-400, fax 202-267-5086
Mr. F. Rawls, ARM-1, fax 202-267-5075
AEC